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14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

16 JENNY LISETTE FLORES, *et al.*,) Case CV 85-4544 DMG-AGR^x
17)
18 Plaintiffs,) EXHIBITS IN SUPPORT OF
19 - vs -) PLAINTIFFS' MOTION TO
20 WILLIAM BARR, ATTORNEY) ENFORCE THE SETTLEMENT
GENERAL) AGREEMENT [REDACTED
21 OF THE UNITED STATES, *et al.*,) VERSION OF DOCUMENT
22) PROPOSED TO BE FILED
23 Defendants.) UNDER SEAL] VOL. 5 OF 5
24)
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28 PLAINTIFFS' MOTION TO ENFORCE Cv 85-4544-DMG(AGRX)

Exhibit 60

Declaration of E [REDACTED] G [REDACTED]

I, Elvio G [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Jutiapa, Guatemala.
2. I left Guatemala with my 15-year old sister because we were being mistreated. My mother and father both live in the United States and my aunt took care of us. She abused us verbally and sometimes physically. She told us she was sorry she ever agreed to take care of us.
3. After we crossed the border, we spent 5 days in the dog kennel. It wasn't easy at all. We were hungry. I couldn't sleep at all. They only gave us very thin mattresses. I was desperate. I could see my sister in a cage down the row from me, but we only could talk once. They said the water was drinkable, but it came out of the top of the toilet, so I didn't trust it. The time in the dog kennel has been the most difficult part of my journey.
4. I've been here at Homestead for 1 month and seven days. My sister is here too. They never told us we would be going together so I was so happy she was sent to the same place. At first, they only let us see each other once a week for an hour on Fridays. But last week they told us the rules had changed and they had to give siblings more time together. So, I've seen my sister for an hour every day for the last few days in the cafeteria with all of the other kids who have siblings here. It feels good to talk and catch up. I missed her.
5. I'm going to turn 18 next week. When that happens, they say they are going to send me to another center. I'm scared of going there because it will be like prison and also because there is a whole other process to go through in order to get out.
6. I have had two counselors while here at Homestead. The one I have now is not actually here. It's a video call with her. My social worker and my counselor both said I have almost been approved for release and the only thing that's missing is an interview with my mom's landlord in New York. My mom said she has been calling my social worker frantically to try to get through to give her the phone number of her landlord. But my social worker is not picking up.
7. I just want to be released to go live with my mother. I hope my social worker finally picks up the phone and finishes processing my case. I'm so anxious and tense.

I, E [REDACTED] G [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



03/26/2019
March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] G [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 61

Declaration of

A [REDACTED] A [REDACTED]

I, A [REDACTED] A [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I am 14 years old. My date of birth is [REDACTED] and I am from Honduras.
2. I left Honduras with my aunt N [REDACTED] my mother's sister, about 6 months ago. We were captured by the Mexican Federal Police when going through Mexico, held in a cold place like the Hielera for 13 days, and then deported back to Honduras by bus. After a couple of days in Honduras, we set out towards the US once again. This time, we crossed the border at Reynosa but were detained by the US border patrol within three hours of crossing.
3. My aunt and I were processed and taken to the Hielera, where we were separated and I have not seen her since then. I was later told that she was deported and returned to Honduras since she was an adult, and that I was going to be sent to a shelter since I was a minor. I was held at the Hielera for 1-1/2 days, after which I was brought to Homestead, where I have been held since December 3, 2018.
4. My mother lives in Honduras with my step-father and 3 siblings; my father was killed many years ago. My aunt Tomaza I [REDACTED] sister of my father, lives in Virginia and is my sponsor. About 1 week after I arrived at Homestead, I was allowed to call my mom and my aunt Tomaza. I have been able to call and talk to them twice each week.
5. Here, I have a social worker who I talk to 1 time each week, when I make one of my calls. I talk with my social worker by a face call on a computer since she is not located here. I believe she is in Texas someplace. Many kids do not have social workers located here. It would be easier if I could talk to my social worker in person. Sometimes, there are problems with the Internet and I have to cut my call short or not talk to her at all, and have to return another time. This has happened to me twice already. This is frustrating and it makes me anxious, since she is my source of information about my case.
6. At Homestead, we are given a place to sleep and study, and are given food and clothing. The food is the same every single day. Breakfast and dinner are always the same, and lunch is sometimes varied. They change the food a little every 15 days and we may be given ice cream. We study every day and there are about 37 boys 14-16 years old, in my classroom. I have learned very little there. Every time new students arrive, we start with basic lessons again.
7. The rules are very strict and must be followed or else they will write a report, and my social worker told me that each report will delay the processing of our release paperwork by 15 days. Also, the judge will see that we have a report(s) in our file and will take that into account in a negative way when making decisions. We are told that when we come to a new country, we have to follow the rules. I have not heard of any other form of discipline.

8. Fights – another boy who was with me in classroom Bravo 11, hit me in the face without provocation and ‘broke’ my nose; now I’m in Bravo 7. I made a report at lunch that when I got to the room he threatened me. The YC (Youth Counselor) did not want to report it and asked me why I tried to report it since I was ok; I asked my counselor to change me to another class and they changed me after two weeks. When I was punched, there were three YCs in the room, but they didn’t see what happened, since two were at the door and one was distracted. The YCs didn’t even see that my nose was bleeding. This happened more than a month ago. My nose was bleeding and was red. I went to the Lead and asked for a pill. The Lead said to ask the YC to let me go to medical and supposedly the YC was going to take me to medical but no one took me. The Lead supposedly made a report. The doctor never examined my nose. The one who broke my nose was released after three weeks, while I am still here. It is not fair, but the social worker tells me that every case is different.
9. I have not told my mother that about my nose. I don’t want her to worry. Already it is very hard. We both cry on the phone. I have not seen my mom or any family for so long. I have been here so long.
10. Weekends – we have classes every day except Saturdays and Sundays, when we are supposed to rest, see movies and listen to music, and practice our religions. But we were told that we can’t see movies on weekends, because the Director says it is better for us to study English. The director says that we have to study every day even though we study during the week. Sometimes they go to put on a movie but the Director says no that we have to study English instead; we have no distraction on the weekends.
11. I do not have a lawyer.
12. I never got a paper about the Flores Settlement.

I, A [REDACTED] A [REDACTED], swear under penalty of perjury that the above declaration is true and complete. [REDACTED] [REDACTED]. [REDACTED] declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

03/26/2019

Date

Certificate of Translation

I, INES VARGAS FRAENKEL, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] A [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.

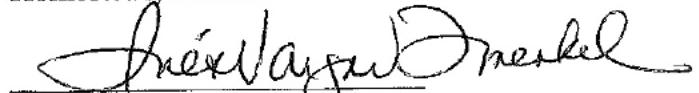

INES VARGAS FRAENKEL
163 Duncan Way
Oakland, CA 94611

Exhibit 62

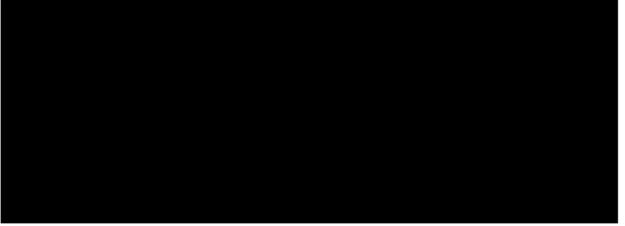
Declaration of A [REDACTED] B [REDACTED]

I, A [REDACTED] B [REDACTED] ([REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from San Salvador, El Salvador.
2. One of the reasons I left El Salvador is because of the danger there. The gangs had been kidnapping kids and recently they killed three kids who go to my school. Lots of parents were taking their kids out of school. I lived with my aunt and she had been dropping me off at the school gates and picking me up as well. But we were still scared.
3. I left El Salvador with my cousin on the 10th of January. She's 17 years old. When we crossed the border they kept us at a place in Texas for two days. They didn't give us very much to eat, just burritos and a soda. We were hungry.
4. My cousin and I were together at the border and for the first couple of weeks here in Homestead. But then she was released a couple of weeks ago. I couldn't say goodbye to her. They didn't let me see her.
5. The rules here are that you can't touch anyone. Sometimes when your friend is crying because they can't stand being here any longer you want to be able to give them a hug. But you can't because it's against the rules.
6. The hardest part about being here is waiting and having to be patient. I know it's a process, but I want to go live with my mom in Atlanta. My social worker and my counselor say my mom already sent her fingerprints and that they did a home study.
7. I think it's taking so long because my father tried to sexual abuse me when I was about six years old back in El Salvador. But my mom is the one who protected me from him and made sure I could go live with my aunt when that happened.
8. I don't know how much longer I will have to wait to see my mother. I miss my mom and my aunt so much. When I lived in El Salvador I talked to my mom all the time by video. Now I can only talk to my mom for five minutes twice a week and my aunt for five minutes twice a week. If I could, I would talk to my mom all day, every day.

9. I know there are kids who have been here longer, but I never thought I would be here for so long. It's sad when your friends leave, and you are still stuck here.

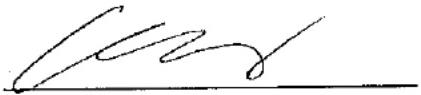
I, A [REDACTED] B [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 63

Declaration of L [REDACTED] M [REDACTED]

I, L [REDACTED] M [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED]. I am from Guatemala. I am 15 years old.
2. I travelled with my older brother and my niece (the daughter of another of my brothers) to the border. We crossed a river and walked for a few minutes before immigration came and took us to a place called a *hielera*. It is not like the shelter here in Homestead. There is just a mattress on the floor and a blanket. They only gave us a sandwich, apples and some water to drink. My brother and I were separated from my niece. She was in a different cell. They told us it was because she is a girl and boys and girls cannot be together.
3. We were all brought here to Homestead about 14 days ago.
4. It's boring here. We cannot go out to play when we want. We pass the whole day in the classroom. At 6am we start the day. They take us to the class and we draw and wait until 8am to eat. Then from 8:30 to 10 am we have class. Then a half hour of recreation. After that is class again and then lunch is at 12 noon. After lunch we have class for two hours and recess for an hour. After dinner we have to return to our room and we have a few minutes to bathe and brush our teeth. We go to bed at 9pm and get up the next day at 20 minutes to 6am. It's hard to have a schedule like this because we are not accustomed to being in school all day.
5. When we arrived the staff told us all the rules – like don't touch one another, no fighting, don't bring food to the tents or to the dormitory. If you do not comply with the rules you can get a report and you will have another 15 days here – they restart your case to leave. A woman who I think was the director told us this during a talk for the children who are recently arrived here.
6. We can make calls two times per week to our families. We only get 10 minutes. But the social worker is usual at my side when I make calls. I would prefer to speak with my family in private. It is not easy to talk to my family when the social worker is sitting with me.
7. I have not been feeling well. I have a headache and my throat hurts too. My throat is worse at night. I went to the medical clinic a few days ago. They gave me some pills and they seemed to help for some time but I still feel sick. I have not gone back to the clinic

yet because none of the staff has come back to take me. In order to go, you have to ask the youth counselor (YC) to write up on a paper that you are sick and that you want to go to the clinic. The YC then hands that off to the lead YC, who then comes to get you and to take you to the clinic. That hasn't happened yet so I am still waiting.

8. I hope that I can leave soon. My father lives in New Jersey and is going to receive my brother, my niece and me. He says that he has to move to another apartment before we can leave here. I would like to leave soon because I am bored here.

I, L [REDACTED] M [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

03/28/2019
Date

Certificate of Translation

I, Teresa Lee, certify that I am fluent in English and Spanish and that I read the above declaration to L [REDACTED] M [REDACTED] in Spanish. Executed this 28 of March, 2019 in Homestead, Florida.

L. J.
Name

2815 Hartford Rd., Ste 110

Falls Church, VA 22043
Address

703.942.4626
Phone Number

Exhibit 64

Declaration of

N [REDACTED] E [REDACTED]

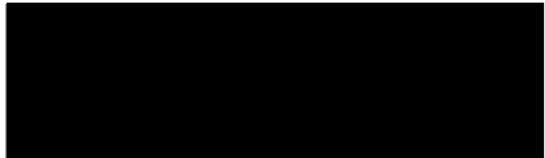
I, N [REDACTED] E [REDACTED] [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I just turned fifteen years old last month. I am from Colombia.
2. I left Colombia on March 10, 2019. I crossed the border near Tijuana into the United States by myself on March 14, 2019. Border patrol officers immediately took me into custody.
3. The officers first took me to a detention center that we call *la hielera* (the icebox) because it is so cold. I had to be there for three days. I did not have any chance to bathe. The bathrooms were in the same room as where we had to sleep. It was awful. The officers spoke in English, so I did not understand what they were saying. But I knew that the officers were not treating us with respect. They gave us sweet things – gummies – and acted as if we should be very happy. They wiggled the gummies in front of us and teased us in an ugly way. After *la hielera*, I was taken to another detention center called *la perrera* (the dog cages) for one day.
4. Then I was brought here to Homestead, Florida on March 18, 2019. I have been here for about eleven days.
5. I want to leave Homestead as quickly as possible. I want live with my mom Ana L [REDACTED] in Los Angeles. She has been living in the United States for thirteen years.
6. I do not know when I will be permitted to leave. My mother has sent in all the paperwork necessary for my release, but no one has given me any information on when I can leave. Not even my social worker has given me this information. My mother has not received a fingerprinting appointment yet. My mother and I do not know when she will be scheduled to give her fingerprints.
7. I am very sad and alone here. My heart is so sad because I am not with my family. Many children here cry and cry.
8. I think children should be released from here quickly. But every girl has to be here for months and months. Some girls are here two months or four months. One girl was here

for nine months. The social workers do not work on cases quickly. The fingerprinting appointments are not scheduled promptly.

9. I try to follow all the rules here. There are many rules. You can't give a friend a hug. You cannot give anyone a handshake, not even your teacher or a YC (Youth Counselor). You can't ever touch anyone. You can't blow a kiss to someone. You must wear the clothes assigned to you. You can't share clothes with a friend. You can't write on your clothes. You can't decorate your clothes. You must keep your clothes clean. You must eat your food in the place where you receive it. If you receive food in the cafeteria, you must eat it there. If you receive food in a classroom, you must eat it there. You cannot bring food from one place to another. You can't sit with a friend on their bed to have a conversation. When you're in your dormitory, you must be in your own bed. You must be in your bed from 9 p.m., when the lights are turned off, until 6 a.m. or 6:30 a.m., when all the girls in my area must wake up. You must make your own bed each morning. You can't talk with any boys ever. You can't write a letter to a boy. You must be in scheduled activities from about 7 a.m. to 7 p.m. You can only shower for five minutes every evening. You can't walk anywhere on your own. You must be with a YC (Youth Counselor) all the time. The YC must watch you all the time. You can't leave.
10. If you don't follow the rules, you will get a report. I know a girl in my classroom who got a report. If you get a report, the judge will find out and read the report. Based on the report, the judge can decide that you are a bad person so cannot stay here in the United States. Then you get deported.
11. Since arriving here, I have been able to talk with mom twice per week, but my calls are limited to ten minutes. I wish I had more time to talk with my mom. She supports me emotionally, and I support her too. When I call my mom, she talks to me quickly, then wants me to talk with my father, my sister, and my aunt. This doesn't leave me with enough time to have a meaningful conversation with my mom. If I had more time to talk with my mom, I would try to figure out how I could get out of here faster. I would also feel better because she comforts me.

I, N [REDACTED] E [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



3/23/2019

Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to N [REDACTED] E [REDACTED] in Spanish. Executed this 27th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 65

DECLARATION OF J [REDACTED] A [REDACTED]

I, Jo [REDACTED] A [REDACTED] P [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is J [REDACTED] A [REDACTED] P [REDACTED]. I was born on [REDACTED] in Petén, Guatemala. I am 17 years old. I am currently held in the detention center for migrant children in Homestead, Florida.
2. I left my home in Guatemala on March 8, 2019, and crossed the border into the United States on a Friday a week later, so I think that would have been March 15, 2019. I crossed into Texas. I spent a total of six days in immigration detention before I was transferred to the place I am now.
3. For the first two days of detention, I was held in a place we called the *hielera*, or “freezer,” because it was very cold. This place was a cell made of cement blocks. We had no mattresses, so we just slept on the floor. We were given nylon or metallic blankets. We did not get showers while we were in this place.
4. Then I was transferred to another place with cages, where I was held for four days. I was allowed to shower once in this place.
5. I arrived in Homestead on March 21. The first thing that happened was that the doctors gave me 9 vaccinations and took my blood. They did not say what they were checking for. They didn’t really explain why they were taking my blood. I haven’t heard what the results of these tests were, and they never told me they would call me back to give me my test results.
6. The YCs explained the rules to me when I arrived. If we want to go to the bathroom, we have to be accompanied by a YC. We have to be accompanied everywhere we go. We can’t use bad words. We have to walk in line when we go anywhere.

7. I'm not sure exactly what happens if you break a rule because I have followed the rules. But the YCs tell us if we break a rule we will get a report. They say the report means a delay in our case, meaning we will stay here longer. The YCs and other officials have said this directly—I have heard them tell us more than once that breaking a rule and receiving a report will affect our case and delay it. They say this whenever they go over the rules with us.

8. I have a brother in California who is willing to care for me. I'm not sure when I will be sent to live with him. I haven't heard anything about what the steps are in the process to allow me to live with him.

9. I hear that because I am about to turn 18, they have to work more quickly to get me out soon. I don't know what will happen with my case if I turn 18 before I am able to leave here and join my brother.

10. We are allowed phone calls two times a week. We can use the phone calls to call relatives in our home countries if we want. I had my call yesterday, so I was able to call my parents in Guatemala for five minutes and my brother in California for five minutes. That is a very short time, but I was glad I was able to speak to them.

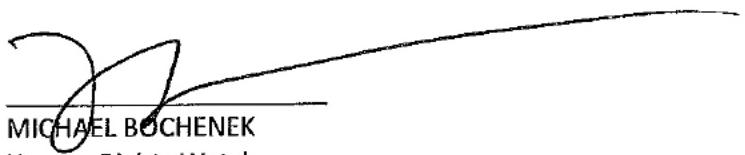
I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.



Date: 03/26/2019

Certificate of Translation

I, MICHAEL BOCHENEK, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] P [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.



MICHAEL BOCHENEK
Human Rights Watch
350 Fifth Avenue
34th Floor
New York, NY 10118

Exhibit 66

Declaration of [REDACTED] D [REDACTED]

I, [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Usulután, El Salvador.
2. I've been held here at the Homestead immigration detention center for children since March 7. When I first came here, they gave us an orientation and told us that we had to follow the rules: no touching, five minutes for taking a showers, 15 minutes to eat, no lending clothes, no taking any food into the bunk room, no sitting on anyone else's bed.
3. If we don't follow the rules or pay attention to the youth counselors they said, we would get a report. If you get a report, you'll end up spending more time here. I heard of one girl who has been here for 6 months and she has 19 reports. I'm lucky that I don't have any reports and I think I'll be released sooner because of it.

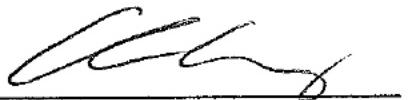
I, [REDACTED] C [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

03/27/2019

March 27, 2019

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to J. [REDACTED] C. [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 67

Declaration of J [REDACTED] P [REDACTED]

I, J [REDACTED] P [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from Cobán, Guatemala.
2. I left Guatemala to travel to the United States with my 17-year-old sister L [REDACTED] C [REDACTED] in early March. We crossed the border into Texas about a week later and turned ourselves in to the Border Patrol.
3. They kept us for four days in a jail near the border. I could see my sister through the wires, but I wasn't allowed to speak to her. If you tried to speak to anyone outside of your cage, they yelled at you. I didn't feel very good in that jail. They gave us food, but some people were hungry because it wasn't enough. We had to sleep on the floor with aluminum foil blankets.
4. I've been here in the Homestead immigration detention center for almost two weeks now. When I got here, they told me the rules of the facility. They said there is zero tolerance for breaking the rules. We can't touch each other. If you break the rules, they'll give you a report. They said if you have a report, they government might not let us live here. So, it's very serious. Luckily, I don't have any reports.
5. My sister is in another part of the facility. They told me that I could see her once a week on Fridays. When I talk with her, she says she's desperate to get out of here. I'm a little desperate too because I want to leave to go stay with my brother in North Carolina. All I can do is wait.

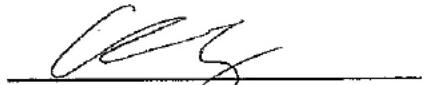
I, J [REDACTED] P [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

3/27/2019

March 27, 2019

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to J [REDACTED] P [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.


Clara Long

Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 68

Declaration of I [REDACTED] P [REDACTED] F [REDACTED]

I, I [REDACTED] P [REDACTED] F [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED]. I am from El Salvador. I am 16 years old.
2. I left El Salvador with my nieces – R [REDACTED] I [REDACTED] and I [REDACTED] G [REDACTED] [REDACTED]. They are 14 and 15. We left El Salvador about a month ago because we could not stay. It was not safe for us there.
3. We crossed a river to enter the United States. We walked for about 10 minutes and immigration found us. They took us to a migration station. We arrived on a Saturday night. We spent two nights in what they call the *perrera*. It was cold in there. We were in a cage together with about 50 people – mothers with their children – both boys and girls – and other children like us who arrived without parents. The cage was so full that when we slept at night some people were sitting up.
4. After that they brought us to Homestead in an airplane. I have been here for 17 days.
5. The food here is always the same. The breakfast is the same. And for lunch they give us what we had for dinner the night before. Sometimes my head or stomach hurts because I'm hungry. I eat breakfast at 9:30 but they make us get up at 6:30 in the morning.
6. The rules here say that we cannot touch each other. We cannot touch each other on the hand or touch another girl's hair. It's really hard. Sometimes something good will happen and my niece will say to me, "give me a hug!" but I have to say "no" because we are not allowed to touch. There are cameras here watching us.
7. The youth counselors says that if you break the rules, you will get a report. They say this report will go to the judge or the government, I'm not sure which, and that the judge or government will think you are a bad person. I don't want a report that could hurt my case.
8. We all cry here. It is hard to be apart from family. Only one of my nieces is in my group here so during the day we see each other only when we play and in the tent in the afternoon for an hour. It makes me sad and feel bad that I cannot be with both of my nieces during the day. We came here together the three of us. We are a group and I don't want to be apart from them.

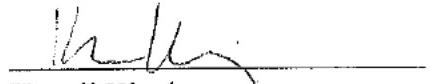
9. I am upset that my nieces may leave here without me. I don't understand what is happening with my sister. She lives in New York and is going to receive the three of us. But it seems like my nieces are going to leave without me and that my sister doesn't have to do fingerprints for them. She had an appointment to do fingerprints for the three of us on in April. I don't understand why my sister does not have to do fingerprints for me. I'm really worried about what will happen if my nieces leave. I do not want to be here alone. We traveled here together.

I, I [REDACTED] P [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

[REDACTED]
27 de marzo 2019
Date

Certificate of Translation

I, Kennji Kizuka, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 27 of March, 2019 in Homestead, Florida. [REDACTED]



Kennji Kizuka

Human Rights First
75 Broad Street, 31st Floor
New York, NY 10004

Exhibit 69

Declaration of [REDACTED]

I, J [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

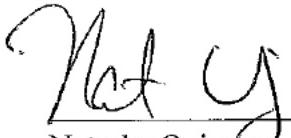
1. I was born on [REDACTED]. I am from Honduras. I am 17 years old. My birthday is next week.
2. I crossed the border into the United States in Texas around the beginning of March. After I crossed immigration took me to a place called the *perrera* ("dog kennel"). It was very cold there. I was given a mat to sleep on and a blanket made of aluminum. They gave us food three times a day – always the same - burritos, milk, apples and sometimes cookies. I was in the *perrera* for three days and three nights.
3. After that I was brought to Homestead. I have been here for 21 days now.
4. Here I have been able to call my mom in Honduras twice a week. My father passed away. I speak with her and my cousin D [REDACTED] in Virginia who is going to receive me when I am released.
5. My cousin went to do his fingerprints on Thursday last week so that he can receive me, but I am still waiting for the results. I am worried what will happen to me if I am not released before my birthday. No one has told me where I will go when I turn 18 and I am nervous because I don't know where they will send me next.

I, Jose J [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

3/27/19
Date

Certificate of Translation

I, Natasha Quiroga, certify that I am fluent in English and Spanish and that I read the above declaration to J█████████ in Spanish. Executed this 27 of March, 2019 in Homestead, Florida.



Natasha Quiroga

Lawyers' Committee for Civil Rights Under Law
1500 K St NW Suite 900
Washington, DC 20005

Exhibit 70

Declaration of E [REDACTED] J [REDACTED]

I, E [REDACTED] [REDACTED] [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED]. I am from Guatemala. I am now 17 years old. My birthday was two days ago.
2. I left Guatemala at the end of January and crossed the border near Mexicali. Immigration detained me after a few minutes and took me to the immigration station. I was in the cold room called a *hielera* for about ten hours and then in a place called the *perrera*. I was there for two days though I didn't know if it was night or day. The lights were on all the time. They gave me a mat to sleep on and a blanket of aluminum to cover myself.
3. I have been here at Homestead since February 3 or 4. That's almost two months now.
4. I don't feel well. I have had a sore throat for four or five days. I went to the clinic but they just gave me some pills. I don't know what they are.
5. The food here is okay, but the food never changes so I am bored of eating the same thing almost every day for two months. The other problem I have is that I think I may be allergic to milk. My face gets red and I don't feel well after drinking milk. But they have not offered me anything else instead of milk. So when they give me milk I either have to throw it out or trade it for some fruit from other boys. Even though that is against the rules it is better to trade for other food instead of throwing out the milk.
6. When I turned 17, they moved to the north side of the shelter. I felt bad on my first night there before I was missing my friends. The dormitory on the north side is much bigger – there are maybe 100 boys sleeping there in one big space.
7. My aunt in Mississippi is going to receive me when I leave the shelter. But the problem is that my first social worker did not advance my case. My aunt sent the documents the social worker asked for but when my social worker changed the new social worker asked for the same documents again that my aunt had already sent. So I think that the first social worker did nothing with the documents my aunt sent. My aunt did an interview with my new social worker this week and now has to go do her fingerprints.
8. I have been here for a long time already. It's hard to stay here for so long. I want to get leave and keep moving forward in life. I hope that I will leave this week.

I, E [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

3/28/19
Date

Certificate of Translation

I, J. W. W., certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] in Spanish. Executed this 27 of March, 2019 in Homestead, Florida.

Weney Wang
Name

Name _____

710 College Ave.

Palo Alto CA 94306

Address

(650) 856-2553

Phone Number

Exhibit 71

Declaration of K [REDACTED] D [REDACTED]

I, K [REDACTED] D [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

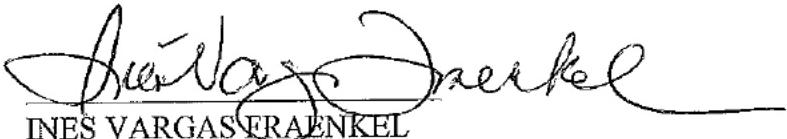
1. I was born on [REDACTED]. I am from Honduras. I am 15 years old.
2. I crossed the border from Ciudad Juarez in Mexico. I went under a bridge and crossed there to the United States.
3. Immigration took me to a *hielera*. It's a small room that is cold. There were some ripped-up aluminum blankets in the room, but they didn't give us new ones. There must have been about 30 boys in the room. At first there wasn't enough room for everyone to sleep but during the night they came and took out about half the boys so then we could lie down.
4. After that they took me to the *perrera*. It was like a huge ward with more than 100 boys. There were no beds, just mattresses on the floor. I was there for three nights. They gave us burritos and juice. Sometimes I felt hungry while I was there because they didn't give us enough to eat.
5. They brought me here to Homestead 20 days ago.
6. Here they say that you can't touch other kids and not to push other kids, things like that. The youth leaders and the people they call leads will make a report if you break the rules. They say that if you fight or do something like that you will get 15 or 30 days. That means that if you were going to leave today, but you get a report then you have to wait 15 or 30 days. I heard from the youth counselors and from other kids here that this is what will happen if you get a report.
7. A couple days ago I woke up with pain in my chest and my back. I don't know why I was feeling like that. It could have been from not sleeping well. I went to the clinic and they gave me some pills to take. I'm not sure what they were.
8. My cousin lives in Los Angeles, California. She says she will receive me there and already did her fingerprints so that I can live with her. I wanted to speak with my social worker on Tuesday to ask about my case. But when I went to make my call to my family, they told me that my social worker was busy on the other floor. I wanted to speak with her but she was working with other kids so I couldn't see her. I hope I can leave here soon.

I, K [REDACTED] D [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

28/03/19
Date

Certificate of Translation

I, INES VARGAS FRAENKEL, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] D [REDACTED] in Spanish. Executed this 28th day of March, 2019, in Homestead, Florida.



INES VARGAS FRAENKEL

163 Duncan Way
Oakland, CA 94611

Exhibit 72

DECLARATION OF J [REDACTED] N [REDACTED]

I, J [REDACTED] N [REDACTED], declare that the following is true and correct to the best of my knowledge and belief:

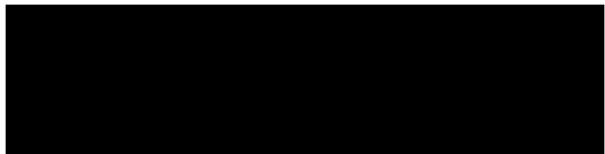
1. My name is J [REDACTED] N [REDACTED]. I was born on [REDACTED] in Aldea Fiscal, Palencia, Guatemala. I am 13 years old. I speak Spanish.
2. I have been detained for 7 days.
3. In Guatemala I lived with my older sister and two nieces. My father lives in the United States, in Kentucky.
4. I left Guatemala with my sister and nieces.
5. In Mexico we were stopped and the police said they would kill us if we did not pay them money. My father paid what they asked and they let us go.
6. We were stopped on our way into the United States three weeks ago. My sister had a form signed by my mother that said I was in the custody of my sister, but I was separated from my sister any way.
7. They took all of my things. Then they put me into a place like a prison, that was called the hielera, for four days. It was terrible for me in that place.
7. It was very, very cold in the hielera. They had taken my coat and all I had on were some pants and a blouse.
8. I slept in a room with lots of kids and I didn't know any of them. We had canvas beds and each of us had two aluminium blankets, one to put underneath and one to put on top.
9. The food in the prison was awful. For breakfast there was oatmeal that was so stale and hard we had to bang on it to break it down, for lunch there was soup, and for dinner there was a burrito that smelled bad and was hard. It seemed like it was several days old. The burrito was so bad I could not eat it. In

between meals they gave us cookies and one little juice box to drink. I was hungry and it was not enough food.

10. In the four days I was in the prison, they only let me talk to my father once, for two minutes.

11. After that I came to the Homestead detention center. I don't know when I'm getting out of here, but I want so badly to leave and go to my father. My mother is sending my papers to the United States. My sister and nieces are already now in Kentucky with my father, but I am still here.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

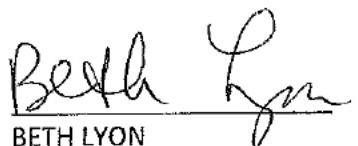


Date: 3/26/2019

Certificate of Translation

I, BETH LYON, certify that I am fluent in English and Spanish and that I read the above declaration to

[REDACTED] N [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.



BETH LYON
Cornell Law School
156 Hughes Hall
Ithaca, NY 14853

Exhibit 73

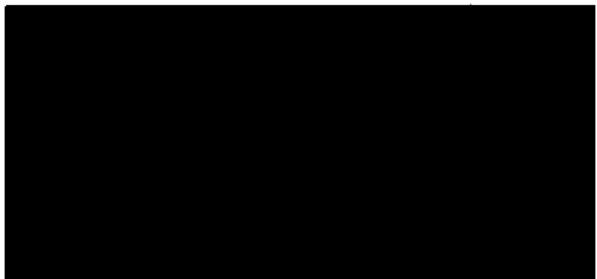
Declaration of R [REDACTED] A [REDACTED]
[REDACTED]
[REDACTED]

I, R [REDACTED] A [REDACTED], [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED]. I was born in San Pedro Sula, Honduras.
2. My mother lives in Juticalpa with my siblings. My father lives in Olancho. Before I left Honduras, I lived alone with my grandmother and grandfather in Olancho.
3. I left Honduras because my grandfather was having problems that meant it was not safe for me to stay.
4. I crossed into the United States about five weeks ago. I was with my uncle. The officers took my documents and my suitcase and separated me from my uncle.
5. I was put in a big cell where I had to sleep with lots of other kids. They called it La Hielera. It was very cold. The food was terrible.
6. They kept me there for six days. I have no idea why they kept me in this awful place. It was a long wait for me and other kids kept with me. I was only allowed to call my aunt once. I was scared and wanted to talk with my family to help me bear what was going on.
7. After the six days in the Hielera, I was brought to this detention center in Homestead. I have been here for about a month.

8. At this place I have gotten sick once. I got a cough with a cold and headache and I was taken to the doctor, but I had to go to school even though I wasn't feeling well.
9. If anyone breaks a rule and gets in trouble, the punishment is being written up in a report. The punishment if you get a report is that when you are ready to be released to your sponsor you are kept here for 15 more days.
10. I am not allowed to leave this facility. If I try to leave I think I will be deported.
11. My aunt said she was going to ask for me to be released to her, and they said that she could.
12. I do not know if I have a lawyer. No one from the government told me I have the right to have a lawyer. I got a lot of papers and I don't remember whether one of them was a list of lawyers.

I, Ra [REDACTED] F [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

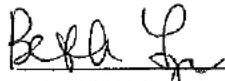


03/25/19

Date

Certificate of Translation

I, BETH LYON, certify that I am fluent in English and Spanish and that I read the above declaration to [REDACTED] in Spanish. Executed this 25 of March, 2019, in Homestead, Florida.



BETH LYON
156 Hughes Hall
Cornell Law School
Ithaca, NY 14853

Exhibit 74

Declaration of

E [REDACTED] E [REDACTED]

I, E [REDACTED] E [REDACTED] [REDACTED], declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from El Salvador.
2. I fled El Salvador for the United States on January 18, 2019, with my uncle. We entered the United States near McAllen, Texas, sometime in early February. When we entered, the immigration officials separated us and I believe he is still in detention. I was in Customs and Border Patrol (CBP) custody for about two days, where I had an apple and some burritos. During those two days, I couldn't even tell whether it was night or day because we weren't permitted to ever go outside. After those two days, immigration put me on a plane and I arrived in Homestead.
3. When I arrived at Homestead, they gave me an orientation of the rules. They said that you can't touch anyone, you can't bully anyone, fight, or say bad words. If you break the rules, they will write a report and the staff at the orientation said that the report will delay your case. The staff also said that if you tried to escape, the government would deport you back to your country. You have to be crazy to try that, I can't even think about that because I really want to stay here in the United States. I plan on always following the rules.
4. My case is getting delayed because I had some trouble with the sponsorship process. The person who was initially going to be my sponsor was the former wife of one of my uncles. However, my former social worker said that since my uncle is no longer with that wife, that woman is no longer considered to be my family and so cannot be my sponsor. That made me so disappointed and I was sad because I didn't know what to do. Luckily, my mom's cousin, who lives in Delaware, offered to be my new sponsor and so she is going through the paperwork and is now waiting to submit her fingerprints. I really hope it is soon because I want to leave here.
5. I was sad to leave my parents but I had no choice because of the violence directed at me in my country. I miss them and even though today is my birthday, it is hard because they can't call me and I can't call them. I get two days a week for ten minutes each to call people and since I called them yesterday, I can't make another call today. It's disappointing because I can't even access the phone to talk to my mom today on my birthday. Nobody has sung happy birthday to me today.
6. Since today is my seventeenth birthday, the staff transferred me to the shelter in the northside of Homestead last night because that is where they keep all of the seventeen year-old boys. It felt weird sleeping in a new place but I made friends so as to fight the boredom here.

I, R [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

03/26/2019

Date

Certificate of Translation

I, Teresa Lee, certify that I am fluent in English and Spanish and that I read the above declaration to E [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.



Teresa Lee
Flores Monitoring

Exhibit 75

**Declaration of
R [REDACTED] A Number [REDACTED]**

I, R [REDACTED] F [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

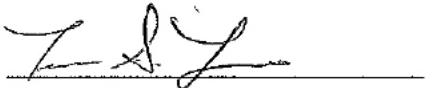
1. My date of birth is [REDACTED]. I am from El Salvador.
2. I left El Salvador sometime in February 2019, I was living with my maternal grandparents there.
3. I arrived in the United States through Reynosa, with my sister and three cousins, and a young nephew. This was on or around February 28, 2019. We were walking for about forty-five minutes when we were apprehended by immigration officials. When we were caught, they separated all of us and my sister and I spent three days in a *hielera*. From there, my sister and I arrived here in Homestead on March 4, and we have been here since then.
4. My mom lives in San Francisco and will be my sponsor. I talk to her twice a week for five minutes because that's all they permit us. She has already submitted all of the paperwork to be my sponsor, including her fingerprints. Nobody here talked to me to explain this process, I learned about this process from some of the other kids who are here.
5. At the orientation the staff gave me when I arrived at Homestead, they told me that it is very important to follow the rules. They also said that if we keep breaking the rules and keep receiving reports, then they will send us to a place that has a lot more security. They never told us anything more about this and I have never seen a list of attorneys while I have been here.
6. Some of the other kids also told me that if someone here doesn't follow the rules, the staff will write up a report. They tell me that if you get a report, you have to stay here longer and that's very prejudicial to us because we all want to get out. I have never broken a rule and don't plan to because I want to get out. I'm excited that my mom is going to be my sponsor and I want to live with her.

I, R [REDACTED] F [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

03/26/2019
Date

Certificate of Translation

I, Teresa Lee, certify that I am fluent in English and Spanish and that I read the above declaration to R. F. [REDACTED] in Spanish. Executed this 26 of March, 2019, in Homestead, Florida.



Teresa Lee
Flores Monitoring

Exhibit 76

Declaration of M [REDACTED] N [REDACTED]

A N [REDACTED]

I, M [REDACTED] N [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. I was born on [REDACTED]. I am from Guatemala. I am 14 years old.
2. I speak Mam and Spanish.
3. I left Guatemala by myself around February 8 and arrived at the border around three days later. I crossed a narrow river with a few other people. Immigration found us and took us to a station. They asked me a lot of questions and then sent me to a place called the *hielera*, where it was very cold. I stayed there for three days.
4. After that I came to Homestead. I have been here for 26 days.
5. Here I have a social worker and a counselor. We meet all three of us together for about 25 minutes two times a week. We meet in a large room where other children are meeting with their social workers and counselors. It is not private.
6. There are many rules here. You can't share food. You can't hug or touch anyone. At night when we return to the dormitories, we have only five minutes to bathe. The youth counselors and supervisors say we cannot leave the facility and that we have to go around in a group.
7. The youth counselors say that if we violate the rules we will receive a report and our release will be delayed by 15 days.
8. I call my mom in Guatemala and my brothers in New York two times a week. We have 10 minutes each time. You cannot ask for more time. They say its only 10 minutes for calls.
9. I can speak Mam and Spanish. I have not met any staff here who can speak Mam. But there are some children here who cannot even speak Spanish. I saw one boy who cannot speak Spanish. He is always sitting alone with his head down. He cannot communicate with anyone. He looks very sad.
10. I am waiting to be released to my brother. My brother sent the papers but they haven't arrived to immigration yet, so he doesn't have an appointment for the fingerprints.

I, M [REDACTED] N [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was read back to me in Spanish, a language in which I am fluent.

26/3/2019
Date

Certificate of Translation

I, Kennji Kizuka, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] N [REDACTED] in Spanish. Executed this 26 of March, 2019 in Homestead, Florida.



Kennji Kizuka
Human Rights First
75 Broad Street, 31st Floor
New York, NY 10004

Exhibit 77

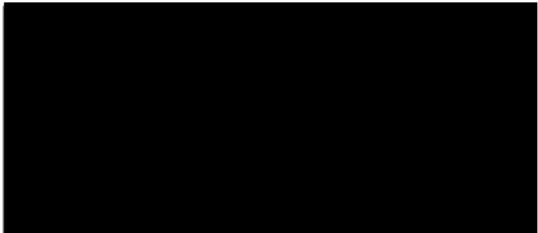
Declaration of

M. U.

I, M. U. declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am seventeen years old. I am from Guatemala. My first language is Quiche. My second language is Spanish.
2. I left Guatemala on or about January 8, 2019. I did not travel with any of my family members.
3. I crossed the border into the United States near Altar, Sonora. I do not remember the date. After I crossed, border patrol officers took me to a detention center that I call *la hielera* for six days. I was bored in the *hielera*.
4. Then officers brought me to the detention center in Homestead, Florida. I have been here for about a month.
5. I would like to leave Homestead and live with my uncle, Juan M. [REDACTED] My uncle Juan lives in Virginia. He has been in the United States for about two years.
6. I do not know when I can leave. I have been told that the only thing that is missing from my case is my uncle's fingerprints. I do not know if my uncle has received a fingerprinting appointment yet. I do not know how to speed up the process that will let me get out of here. My uncle also does not know. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
7. There are many rules here. You cannot hug a friend or touch anyone. You cannot try to leave. You cannot walk freely, but must be with a YC (Youth Caseworker) all the time. If someone does not follow the rules, he will get a report. If you get a report, or especially if you get many reports, then it is a problem for you. The reports get shared with the government and the judge. The judge will see that you did not act properly, and then there will be consequences for you. The judge will require you to stay here for a longer time.
8. I follow all the rules here. My social worker has told me that if you don't get reports, you can leave faster.
9. I do not have an immigration lawyer. I do not know how to apply for asylum.

I, M [REDACTED] U [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

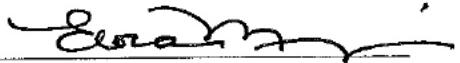


26/03/2019

Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to M [REDACTED] U [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 78

Declaration of

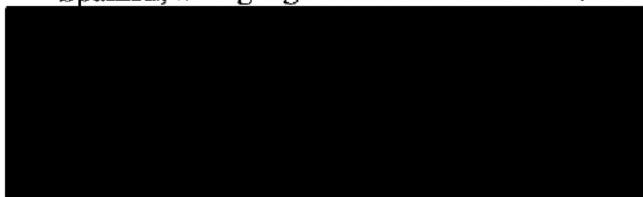
A [REDACTED]

I, A [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am thirteen years old. I am from El Salvador.
2. I left El Salvador on February 10, 2019. I traveled to the United States with my 19-year old sister Erika B [REDACTED] and my 17-year old cousin Oscar E [REDACTED]. We crossed the border in or near El Paso, Texas on February 24, 2019. Border patrol officers took us into custody very quickly. The officers took us to a building where they separated me from my sister. I felt very sad and scared.
3. The officers then took me to a detention center called *la perrera* (the dog cages) for two days. Then I was brought to the detention center here in Homestead, Florida. I arrived here on February 28, 2019.
4. I would like to leave this place and live with my mother Maria [REDACTED] in Irvine, Texas. She has been in the United States for about five or six years.
5. I do not know when I will actually be released from the detention center in Homestead. I want to get out of here as quickly as possible. I do not know why I am still here. I do not know how to speed up the process that will let me get out of here. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
6. I sometimes feel sad and depressed. When I hear about other children being here for months and months I feel upset. There was one girl who was even here for eight months. It is very sad to be here for so long.
7. Children must follow all the rules and there are many. We are not allowed to leave. We must be with a YC (a Youth Counselor) who watch us all the time. The rules of the center do not permit children to give each other a hug or touch each other in any way. Children are only permitted to use pencils, never pens.
8. If you break a rule, the YC or a supervisor will write a report and you will have to stay here one month extra for each report. If you try to leave the center, you will be deported.
9. I know a girl here who had a report about her. She had to stay here an extra month. I have not asked her why she had a report written about her. It is a hard question to ask.

10. I follow all the rules here because I do not want any reports about me. I know that I cannot even give my friends a hug, even when they really do need a hug. I am afraid that if I give my friends a hug, I will get a report. I do not want to be detained here any longer.
11. I am able to call my mother twice a week but only for ten minutes. I wish that my phone calls with my mother could be longer. I do not know why I cannot speak with my mother for a longer period of time. If I had more time to talk with my mother, I would try to figure out how to get out of the Homestead detention center more quickly. I would also feel better because I would get more emotional support. I feel completely alone here.
12. I do not have an immigration lawyer. I do not know how to apply for asylum. No one has told me about my *Flores* rights.

I, A [REDACTED] E [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

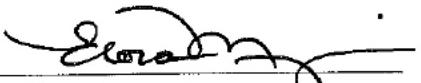


03/26/19

Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] E [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 79

Declaration of

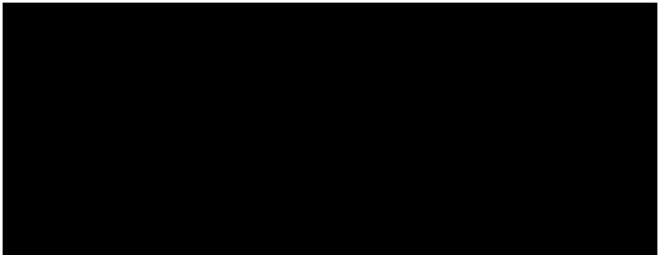
DA [REDACTED] N [REDACTED]

I, D [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I just turned thirteen years old last month. I am from Honduras.
2. I made the journey north from Honduras with my uncle and two cousins. We left Honduras in early January 2019.
3. On or about February 20, 2019, I crossed the border by Tuscon, Arizona with my uncle Rufino M [REDACTED] and one of my cousins, Evil M [REDACTED]. Shortly after we crossed the border, we were taken into custody by border patrol officers. Officers quickly separated me from my uncle and my cousin.
4. The border patrol officers put me in a detention center called the *hielera* (icebox) in or near Tuscon for about four days. I was detained in the *hielera* with other boys. Some of the guards in the *hielera* treated us badly. When we were talking with each other, the guards got angry. They would yell at us, “Silencio uno. Se quieto.” (“Silence yourself. Stand still.”) We did not have beds or proper bedding. We only got mats and foil sheets. The lights were on all the time, even at night.
5. After spending about four days in the *hielera*, I was put in a plane and then brought to this detention center in Homestead, Florida. I arrived here on or about February 25, 2019. I have been here for about one month.
6. I would like to leave this detention center in Homestead and live with my brother Yo [REDACTED] A [REDACTED] who is 25-years old, in North Carolina. Yo [REDACTED] has been living in the United States for about four or five years. It is my understanding that before I can leave Homestead, papers need to be collected about me from Honduras, that Yo [REDACTED] needs to fill out paperwork, and that his fingerprints need to be collected.
7. I do not know when I will actually be released from the detention center in Homestead. I want to get out of here as quickly as possible. I do not know why I am still here. I do not know how to speed up the process that will let me get out of here. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.

8. I sometimes feel sad and depressed here. When I hear about other children being here for long periods of time, such as six months or eight months, I feel very depressed. It is so very sad to be here for so long. I worry that I might be detained here for so long. But I want to leave here and live with my brother Y [REDACTED]
9. Children like me are not allowed to leave this detention center. We must be with a YC (a Youth Counselor) at all times here. The YCs watch us at all times and make sure that we never try to leave. The YCs have told us that if a child tries to leave, the police or other officials will come looking for us. It is just not possible for a child to leave when he wants to go. Children here also cannot touch each other or give each other a hug.
10. If any child breaks a rule, a report will be prepared about the child who broke the rule. Every report results in 15 days or one extra month of detention for that child. This is because when a report is prepared, the social worker will stop working on that child's release from this detention center for 15 days or one month. I follow all the rules here because I do not want any reports about me. I do not want to be detained here any longer.
11. I am able to call my brother Y [REDACTED] twice a week. At times my phone calls are limited to five minutes. At other times my phone calls are limited to ten minutes. How much time I am allotted depends on which YC is supervising my calls. I wish that my phone calls with Y [REDACTED] could be longer. I do not know why I cannot speak with Y [REDACTED] for a longer period of time. If I had more time to talk with Y [REDACTED] I would try to figure out how to get out of the Homestead detention center more quickly.
12. I have been able to call my mother and father in Honduras several times since arriving in Homestead. But my phone calls with them are also limited to about five or ten minutes. I wish that I could speak with them longer. If we had more time to speak, they could help me figure out how to get out of here.
13. I do not have an immigration lawyer. I feel alone here. I do not know how to apply for asylum.
14. I am worried about my uncle Rufino M [REDACTED] who I crossed into the United States with. I do not know where my uncle is now or what happened to him after he crossed the border. He has not called our family since crossing into the United States. I wish that I had a way to communicate with him.

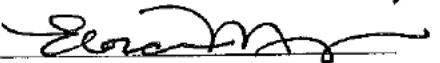
I, D [REDACTED] M [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



03/26/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to D. [REDACTED] M. [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 80

Declaration of Z [REDACTED] P [REDACTED]

I, Z [REDACTED] P [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from San Jorge, San Miguel, El Salvador.
2. The main reason I left El Salvador is because I felt threatened by a gang. I was going to high school in the town near my house and every day a gang member would try to find me as I walked out of school. He wanted me to be his girlfriend, but I said no.
3. I was scared of him because I know of another girl who was dating a gang member and they killed her. Then they cut off her arms and legs and used her WhatsApp account to send the picture to her mother. My cousin, who is a gang member and knows the guy who was bothering me, came to warn me. He told me he heard them talking about doing terrible things to me and that if I could flee, I should.
4. I left El Salvador on the fifth of March. On the trip up through Mexico the car I was riding in was attacked by an armed man. Some of the other migrants were wounded. I ran out of the car and hid in the woods. My legs were shaking so hard I could barely run. I was so scared. In that moment, I regretted trying to flee because I didn't want to die on the trip. I wanted to stay with my mom. But I also could never make my mom go through me being killed in El Salvador by the gangs, so I had to leave.
5. I crossed the border near McAllen, Texas. The Border Patrol had me in a room with benches and a toilet without walls for a few hours and then they moved me to the dog kennel. It was awful there. The lights never went out. It was so cold. I tried to not drink any water to not go to the bathrooms because they were dirty. They never let us brush our teeth or wash. I had a terrible headache, but I didn't feel I could ask for any help because they wouldn't pay attention. They don't pay attention to anyone. I was in a cage with other girls, and they wouldn't let us sleep. They would come in all the time to count us or to bring someone or take someone out. I never want to see aluminum again after using those blankets. The sound of them stressed me out. I was there for four days.
6. After that, they brought me here to the Homestead child immigration detention center. I've been here now for almost a week. I haven't met with my social worker, but I really want to in order to start the process of being released to be with my grandfather in

Maryland who is a legal resident of the US. No one is hurting me here but it's not like being with family or even being able to have a phone and do a video call with them. I'm only allowed to talk to my mom for 5 minutes and my grandpa for five minutes. That's not really enough time to say more than a quick hello and make sure she's okay. The first time I talked to my mom I cried so much that I think I worried her, so I tried not to cry after that. I didn't tell her about what happened in Mexico because there wasn't time and I don't want her to worry now.

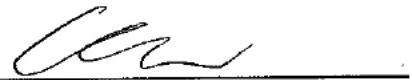
I, [REDACTED] P [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

63-26-2019

March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to Ze [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 81

Declaration of

I, Ca [REDACTED] A [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I just turned thirteen years old two months ago. I am from Guatemala.
2. I made the journey north from Guatemala with my aunt and my 11-year old female cousin. We left Guatemala in February 2019.
3. I crossed the border into the United States at a big bridge with my aunt and my cousin. Just after we crossed the border, we were taken into custody by border patrol officers. Officers quickly separated me from my aunt and my cousin. I felt bad when I was separated from my aunt and my cousin. I do not remember the precise date that we crossed into the United States.
4. The border patrol officers put me in a detention center called the *hielera* (icebox) for about four days. I was detained in the *hielera* with other boys. I was cold in the *hielera*. I was only allowed to keep a little bit of clothing, not enough to stay warm. We did not have beds or proper bedding. We only got mats and thin foil sheets. The lights were on all the time, even at night. At the *hielera*, I was not allowed to make any phone calls, not even to my mother. I did not receive any information about what had happened to my aunt or my cousin.
5. After being in the *hielera* for about four days, I was brought to the detention center in Homestead, Florida.
6. I do not know why I am here. I want to leave from the detention center in Homestead. I want to live with my mother Gladys V [REDACTED]. She lives in New Jersey. Her phone number is (24 [REDACTED]). She has been in the United States for about five years. She is a wonderful mother. My three brothers (ages 4, 10, and 11) are already living with her. My 11-year old female cousin who crossed the border with me was in detention before, but now she is living with my mother. I want to live with my mother too.
7. But I do not know when I am going to leave from the detention center in Homestead. My mother is trying to help me leave, but we do not know when I will be released. I have not received any information on when I will be reunited with my mom. I don't know what I can do to speed up the process. Neither does my mom.

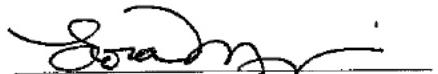
8. I do not know anything about the *Flores* settlement agreement. I do not have a lawyer. No one here has given me information about my release options under *Flores*.
9. Children like me are not allowed to leave this detention center. We must be with a YC (a Youth Counselor) at all times here. The YCs watch us at all times and make sure that we never try to leave or touch any other child. It is just not possible for a child to leave when he wants to go or give anyone a hug.
10. If any child breaks a rule, a report will be prepared about the child who broke the rule. Every report results in one extra month of detention for that child. I follow all the rules here because I do not want any reports about me. I do not want to be detained here any longer, and I am afraid of having a report written about me.
11. I am able to call my mother twice a week. My phone calls with her are limited to ten minutes. I wish that my phone calls with my mother could be longer. I do not know why I cannot speak with her for a longer period of time. If I had more time to talk with my mother, I would try to figure out how to get out of the Homestead detention center more quickly.
12. I do not have an immigration lawyer. I feel alone here. I do not understand how to apply for asylum.
13. I sometimes think about my aunt who crossed the border with me. I do not know where she is or what happened to her.

I, C [REDACTED] A [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

26/03/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to C [REDACTED] A [REDACTED] in Spanish. Executed this 26th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 82

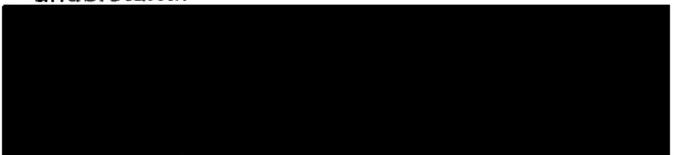
DECLARATION OF M [REDACTED] I [REDACTED]

A [REDACTED]

I, M [REDACTED] I [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is M [REDACTED] I [REDACTED] I was born in [REDACTED] in Quiché, Guatemala. I am 16 years old. I speak a little Spanish and Quiché. I speak Quiché best.
2. When I crossed the border into the United States, I spent two days in the dog kennel, a place where a lot of kids were held in big cages. It was really sad there. The food was yucky, and it was cold.
3. I have spent 26 days in the immigration detention center for migrant children in Homestead, Florida, where I am held now. I am hoping to be released to my sister, who lives in Massachusetts. I am not sure what else needs to happen before I can live with my sister. Yesterday, my social worker said my sister has sent her fingerprints and had me sign something. I don't know what it was.
4. I talk on the phone with my father and my sister twice a week. There's no one here I can speak Quiché with. I hope I can go live with my sister soon. I feel so alone here.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language which I understand.



Date: 03/26/2019

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to M[] I[] in Spanish. Executed this 26th day of March, 2019, in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA

Exhibit 83

Declaration of H [REDACTED] P [REDACTED]

I, H [REDACTED] P [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am from San Juan Zacatepequez, Guatemala.
2. I crossed the border about two weeks ago near Juarez, Mexico and turned myself in to the Border Patrol. They kept me for three days locked up in a big warehouse full of boys. There were only very tiny bunk beds with thin mattresses, three on top of each other. There was nothing to do there besides watching TV. The food was not enough, just oatmeal, instant soups and a burrito. I was hungry. We just slept and waited.
3. After two days, they put me on a bus at about 7 pm at night with a lot of other boys and girls. We had to stay on the bus until about 8 pm the next day while we drove to another part of Texas. It was hard to sleep in the seat.
4. I arrived here at the Homestead immigration detention center for children nine days ago. I saw my counselor a few days after arriving, but I haven't had a meeting with my social worker yet. I think he was going to talk to my mother and then call me for a meeting but he hasn't done that yet. I am anxious to see him so that I can start the process to be released to my mother who lives in California.
5. It's really boring here. We just go from our rooms back and forth to the class and the cafeteria, the same thing almost every day from 6 am to 6 pm. When you have something to do it's okay but there is a lot of downtime and that's when I get desperate because I think about being locked up. The worst is waking up in the morning and realizing again that I'm still being detained here. I hope I can be released soon.

I, H [REDACTED] P [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

3/26/2019

March 26, 2018

Certificate of Translation

I, Clara Long, certify that I am fluent in English and Spanish and that I read the above declaration to He [REDACTED] P [REDACTED] in Spanish. Executed this 26 of March in Homestead, Florida.



Clara Long
Human Rights Watch
350 Sansome St. Ste. 1000
San Francisco, CA 94104

Exhibit 84

DECLARATION OF A [REDACTED] S [REDACTED]

I, A [REDACTED] S [REDACTED] declare that the following is true and correct to the best of my knowledge and belief:

1. My name is A [REDACTED] S [REDACTED]. I was born on [REDACTED] in the San Pedro Department in Guatemala. I am currently held in the immigration detention center for migrant children in Homestead, Florida.
2. I lived with my grandmother in Guatemala. I have two younger siblings who live in the United States and one younger sibling in Guatemala. My mother lives in New York and she is my sponsor.
4. I left Guatemala on March 4, 2019. I travelled by myself. I crossed the Rio Grande River into Texas on the night of March 14, 2019 into the United States.
5. Immigration agents apprehended me about 30 minutes after crossing. I spent three days in the "hielera" and one day in the "perriera". I was fed only a sandwich and a juice in the hielera two times the first day and I had to sleep on the floor. In the perriera, I was fed three times a day a sandwich, a water, and a cookie. I slept on a mattress on the floors. Then I was transferred to Homestead on March 18th.
6. When I arrived, the staff here told me the rules: we have to walk in a line with our group, showers are only 5 minutes, and we have only 15 minutes to eat. If we break the rules, we will get a report. I was told by the YC that we have to behave ourselves because if we do not, then we will get a report. I was told by the YC if we get a report, I will have to stay at Homestead for 25 more days and it will delay her case. This scares me and makes me want to follow the rules.
7. We only get 5 minutes to shower but I would like more time because I have long hair.

8. I was told I can speak to a social worker twice a week but I have only spoken to a social worker one time since I have been here. I was supposed to meet with my social worker yesterday, but it never happened. I do not know when I will meet with my social worker or what her name is. I would like to speak with her.

9. I have not met with a counselor since I have been here and I would like to talk to someone about my experiences. No one told me how many times per week I can speak to a counselor or if I would be able to.

I make this declaration under penalty of perjury under the laws of the United States. This declaration was provided to me in English and read to me in Spanish, a language in which I am fluent.

[Redacted]
Date: 3/26/19

Certificate of Translation

I, NATASHA QUIROGA, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] in Spanish. Executed this 26th day of March, 2019, in Homestead, Florida.



NATASHA QUIROGA
Lawyers' Committee for Civil Rights Under Law
1500 K St NW
Suite 900
Washington, DC 20005

Exhibit 85

Declaration of
A [REDACTED] Q [REDACTED]

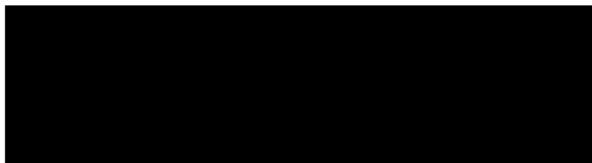
I, A [REDACTED] Q [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. I am fifteen years old. I am from Guatemala.
2. My primary language is Quiche. I do not speak much Spanish. It is hard for me to speak in Spanish. In Guatemala, I almost always spoke in Quiche.
3. I left Guatemala on February 14, 2019. I traveled to the United States by myself, without any of my family members. I do not remember where or when I crossed the border. When I crossed, border patrol officers were waiting for me. They detained me and put me in *la hielera* for one night, where it was very cold and crowded with girls. Then they put me in *la perrera* for three days. It was crowded.
4. Officers brought me to the detention center in Homestead, Florida on February 25, 2019. I would like to leave this place and live with my aunt Juanez. She lives in Houston, Texas.
5. I do not know when I can leave. No one has given me this information. My aunt Juanez has a fingerprinting appointment on May 10, 2019. My aunt and I do not understand why the fingerprinting appointment is such a long time away. I do not know how to speed up the process that will let me get out of here.
6. Some children are detained here for months and months. One girl was here for seven months. Many children cry because they are detained here for so long. There is a girl who has been here for two months who cries and cries.
7. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
8. In my dormitory, Golf 8, there are about fourteen girls, but none of them speak Quiche. There are children here who speak Quiche, but none of the teachers and none of the YCs (Youth Counselors) speak Quiche. The teachers and the YCs always speak in Spanish and English.
9. There are many rules here. You cannot give a friend a hug. You cannot give anyone, not even your teachers, a handshake. You must respect the YCs (Youth Counselors) and stay

with them all the time. You must keep your clothes clean. You cannot draw on or decorate your clothes. You must wear your own clothing. You cannot share your clothing with a friend or borrow a friend's clothing. You cannot sit on a friend's bed to have a conversation. You must stay in your own bed. You must be in your bed from 9 p.m., when the lights are turned off, until 6:30 a.m., when the lights are turned on. You must wake up at 6:30 a.m. every day. Only one person can use the bathroom at a time.

10. If you don't follow the rules, you will get a report. If you get a report, you will have to stay here for more time.
11. I do not have an immigration lawyer. I feel alone here. I do not know how to apply for asylum.

I, A [REDACTED] Q [REDACTED] swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.



27 03 2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to A [REDACTED] Q [REDACTED] in Spanish. Executed this 27th day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

Exhibit 86

Declaration of

K [REDACTED] M [REDACTED]

I, K [REDACTED] M [REDACTED] declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection.

1. My date of birth is [REDACTED]. Today is my seventeen year old birthday. I am from Honduras.
2. I left Honduras on February 23, 2019. I traveled north without any family members. I crossed the border through the river near Reynosa into the United States on or about March 8, 2019. I walked for hours until the border patrol officers found me and took me into custody.
3. The officers first took me to a detention center called *la hielera* in McAllen, Texas. I was there for about a day. The *hielera* was a horrible, ugly experience. I was so hungry. We received terrible food that was mostly still frozen and wet and wrapped in wet paper. I could not eat the food because it was disgusting. I only could drink the water and eat a cookie. I could not sleep because I was so hungry and so cold. The officers did not give us sufficient clothing. They only gave us an aluminum sheet, but it was not enough to keep me warm. There were no beds. The bathrooms were dirty. Many girls were crowded together with me.
4. The officers then took me to a detention center called *la perrera* (dog cages) for three days. I was in a cage with many other girls. We were crowded together. The food was disgusting there too. I could not eat most of it. I only drank water and ate a cookie when I was given one. We did not have any beds, but there were mats. The bathrooms were very close to our mats, and the toilet area was extremely dirty. The bathrooms were not cleaned once in the four days that I was there. The lights were on all the time. There were no windows. The guards would yell at us. They would get angry when they called a girl's name and she did not respond. I could hardly sleep at *la perrera* because I was so cold, so hungry, the lights were on, and the guards were yelling. I felt very sad and scared.
5. I was brought to the detention center in Homestead, Florida on March 12, 2019. I would like to leave this place and live in San Antonio with my mom Miriam S. [REDACTED] Bonilla. She has been living in the United States for three years. Her phone number is [REDACTED]
6. I do not know when I can leave. No one has given me this information. My mother has submitted all the paperwork necessary for me to leave. My social worker has received

these documents. But no one has talked with me or my mother about fingerprints. A friend of mine here said that my mother must give her fingerprints. But neither my mom nor I have any information about how my mom can give fingerprints. I do not know how to accelerate the process that will get me out of here.

7. The children here are here for months and months. One girl has been here for 130 days. This is too long. We should be with our families. Children here cry and cry.
8. I do not know anything about the *Flores* settlement agreement. No one here has given me information about my release options under *Flores*.
9. I do my best to follow all the rules here, and there are so many. You can't give a friend a hug. You cannot give anyone a handshake, not even your teacher or a YC (Youth Counselor). You can't ever touch anyone. You can't blow a kiss to someone. You must wear the clothes assigned to you. You can't share clothes with a friend. You can't write on your clothes. You can't decorate your clothes. You must keep your clothes clean. You must eat your food in the place where you receive it. If you receive food in the cafeteria, you must eat it there. If you receive food in a classroom, you must eat it there. You cannot bring food from one place to another. You can't sit with a friend on their bed to have a conversation. When you're in your dormitory, you must be in your own bed. You must be in your bed from 9 p.m., when the lights are turned off, until 6 a.m., when all the girls in my area must wake up. You must make your own bed each morning. You can't talk with any boys ever. You must go to school at 7 a.m. and must stay in scheduled activities until 7 p.m. You only have five minutes for a shower each evening. You can't open any doors. You can't walk anywhere on your own. You must be with a YC (Youth Counselor) all the time. The YC must watch you all the time. You can't leave.
10. If you break a rule, you will get a report. It is a piece of paper saying the bad thing that you have done. If you get a report, you will have to stay here twenty extra days or one month extra. The report will go to a judge.
11. Since arriving here, I have been able to talk with my family twice per week, but my calls are limited to ten minutes. It is not sufficient time. I wish I had more time for phone calls. I think having more time to talk with my loved ones would help me feel better.
12. I do not have an immigration lawyer. I feel alone here. I do not know how to apply for asylum.

I, K [REDACTED] M [REDACTED], swear under penalty of perjury that the above declaration is true and complete to the best of my abilities. This declaration was provided in Spanish, a language in which I am fluent, and was read back to me in Spanish.

[REDACTED]
08/2019
Date

Certificate of Translation

I, Elora Mukherjee, certify that I am fluent in English and Spanish and that I read the above declaration to K [REDACTED] M [REDACTED] in Spanish. Executed this [REDACTED] day of March, 2019 in Homestead, Florida.



Elora Mukherjee, Esq.
Morningside Heights Legal Services, Inc.
Columbia Law School
435 W. 116th Street
New York, NY 10027
Tel: 212-854-4291

CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On this date, May 31, 2019, I electronically filed the following document(s):

- EXHIBITS IN SUPPORT OF PLAINTIFFS' MOTION TO ENFORCE THE SETTLEMENT AGREEMENT [REDACTED VERSION OF DOCUMENTS PROPOSED TO BE FILED UNDER SEAL] VOL. 5 OF 5

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Peter Schey
Attorney for Plaintiffs